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No. 246

IN THE

Supreme Court of the United States

OCTOBER TERM, 1964.

NATIONAL BULK CARRIERS, INC.,
Petitioner,

v.

UNITED STATES OF AMERICA.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE THIRD CIRCUIT.

REPLY OF PETITIONER TO MEMORANDUM FOR THE UNITED STATES.

JACQUIN D. BIERMAN,
Counsel for Petitioner.

MYRON SEMMEL,
666 Fifth Avenue,
New York, New York,
Of Counsel.

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Petitioner concedes that the legal issue in the instant case is identical in every material respect with that in the companion case of *Waterman Steamship Corporation* v. *United States*, No. 245, this Term (herein referred to as the *"Waterman Steamship"* case). Petitioner nevertheless desires the opportunity to be heard independently on the issue.

The material contained in the Government's Memorandum in the *Waterman Steamship* case is conceded to be equally pertinent in the instant case. For the purpose of replying to that Memorandum, and in the interest of saving the time of the Court, Petitioner unqualifiedly endorses as though they were its own, the points contained in the Reply

of Petitioner to Memorandum for the United States, filed this date by Petitioner in the *Waterman Steamship* case.

Respectfully submitted,

JACQUIN D. BIERMAN,
Counsel for Petitioner.

October , 1964

MYRON SEMMEL
666 Fifth Avenue
New York, New York
Of Counsel.

Certificate of Service.

I, the undersigned, the attorney for the Petitioner herein and a member of the Bar of the Supreme Court of the United States, hereby certify that on the day of October, 1964, I served a copy of the foregoing Reply of Petitioner to Memorandum for the United States on Respondent herein, by mailing a copy of the same to the Solicitor General, Department of Justice, Washington 25, D. C., and the Honorable David I. Granger, attorney of record for Respondent in the court below, Department of Justice, Washington 25, D. C.

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Counsel for Petitioner,
and
Member of the Bar of the Supreme Court of the United States.